

### **REMARKS**

Claims 1-22 are pending in the application. Independent claims 1, 8, 15, 17, and 18 have been amended to recite that the display data in the part data unit is entered as an object separately from the body data unit. These independent claims, and dependent claims 3, 10, and 16 have been amended to recite that the part data unit includes a file name of display data or sound data. The amendments are fully supported by the application as originally filed (see, e.g., page 6, line 30 to page 7, line 8; page 8, lines 19-24; page 13, line 26 to page 15, line 11; and page 17, line 25 to page 19, line 22; see also FIGS. 2, 3, 7, and 9).

Applicant's claimed invention is directed to electronic book contents including a body data unit and a part data unit, where the body data unit includes event data, and the part data unit includes a file name of display data divided into a plurality of regions (see, e.g., FIGS. 2-3).

As amended, independent claims 1, 8, 15, 17, and 18 require the display data in the part data unit to be entered as an object separately from the body data unit. For example, as described on page 19, lines 8-22 of the specification, a part of text data, image data, or the like "can be entered as an object, and display data is divided to allow the display data to be stored for each page." Referring to FIG. 3, the display data in part data unit 13 includes objects entered separately from the body data unit 12.

Claims 1, 2, 8, 9, and 18 were rejected under 35 USC 102(b) as being anticipated by "the source code for 'The Declaration of Independence A History' (hereinafter "History"). Claims 6, 13, 15, and 17 were rejected under 35 USC 103(a) as being unpatentable over History in view of U.S. Patent Application Publication US 2002/0049833 to Kikinis. The remaining claims were rejected over various combinations of prior art references. These rejections are respectfully traversed.

The "History" document, whether taken alone or in combination with Kikinis, does not teach or suggest electronic book contents including a body data unit and a part data unit, where the part data unit includes a file name of display data divided into a plurality of regions, and the display data in the part data unit is entered as an object *separately* from the body data unit.

In the Office Action, the Examiner cited the "History" document, which corresponds to the HTML source code of a document titled "The Declaration of Independence, A History" available on the Internet. In other words, the Examiner is suggesting that the claimed invention is anticipated or obvious over fundamental HTML source code of this document.

For the Examiner's convenience, Applicant has cited in the attached Information Disclosure Statement (IDS) a document titled "A Beginner's Guide to HTML" (hereinafter "Beginner's Guide") as published by the National Center for Supercomputing Applications at the University of Illinois in April, 1996. The Beginner's Guide explains basic HTML programming, which would be known to one of ordinary skill in the art.

In the Office Action, it was alleged that the markup tag <BODY> in the History document corresponds to a "body data unit," and the markup tag <P> corresponds to a "first identifier" of the body data unit, as recited in the claims. It was further alleged that the text of the History document comprises a "part data unit."

However, as indicated on page 5 of the Beginner's Guide, and known by one of ordinary skill in the art, the markup tag <BODY> "contains the content of your document", i.e., the text of the document. The tag <P> is used to indicate separate paragraphs.

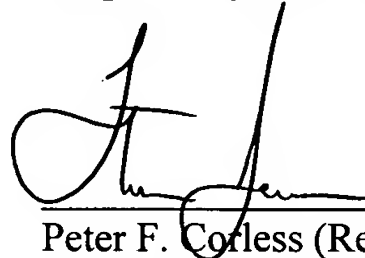
Therefore, the <P> tag does not designate any contents displayed on a display region, but merely indicates **the start of a new paragraph** (see Beginner's Guide at page 5). Each appearance of the <P> tag indicates a new paragraph, in accordance with conventional HTML programming. Therefore, the <P> tag cannot serve as a "first identifier," because it already has a different, well known function in HTML programming.

Moreover, in the History document, the text is not provided in a separate "part data unit," or "entered as an object separately from said body data unit," as required in the Applicant's claimed invention. Instead, text in the History document immediately follows the <BODY> tag. There is no teaching or suggestion of entering this text in a separate "part data unit" such that the text can be entered as an object *separately* from a "body data unit," in order to allow for easier editing, as taught in the Applicant's invention (see, e.g., specification at page 19, lines 8-22).

For at least the reasons discussed above, the "History" reference does not anticipate or render obvious the Applicant's claimed invention, whether taken alone or in combination with the Kikinis reference.

It is believed the application is in condition for immediate allowance, which action is earnestly solicited.

Respectfully submitted,



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